

EXHIBIT A

- PETER WEDLAKE -

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

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In Re:) Chapter 11

MOTORS LIQUIDATION COMPANY,) CASE NO.
et al., f/k/a General Motors) 09-50026 (REG)
Corporation, et al.,)

(Jointly Administered)

Debtors.)

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DATE: April 24, 2012

TIME: 10:05 a.m.

DEPOSITION OF PETER WEDLAKE, held at
the offices of Dickstein Shapiro, 1633 Broadway,
New York, New York, pursuant to Agreement, before
Hope Menaker, a Shorthand Reporter and Notary
Public of the State of New York.

1 - PETER WEDLAKE -

2 two conversations. Do they run into each other,
3 these conversations, or are you able to isolate in
4 your memory two distinct conversations?

5 A. I'm not able to.

6 Q. Okay. So then I'm just asking,
7 whether it was one or two, what else you or
8 Mr. MacKeigan said to Steve Golick on this topic
9 of terminating the swaps?

10 A. We advised him that we, the estate,
11 wanted to repudiate the contract.

12 Q. Okay. And was that something that
13 you said or Mr. MacKeigan said to Mr. Golick?

14 A. I don't recall.

15 Q. Okay. And did you explain to him why
16 the estate wanted to repudiate the contract?

17 A. I don't recall if we explained it to
18 Mr. Golick.

19 Q. Did you at the time have an
20 understanding as to why the estate wanted to
21 repudiate the contract? Again, other than an
22 understanding that may have come from
23 conversations with Cox & Palmer.

24 A. All those discussions around how to
25 deal with the swap agreement were with my legal

1 - PETER WEDLAKE -

2 doing it -- filed administration.

3 MR. O'DONNELL: I'm going to caution
4 the witness not to speculate. He's asking
5 for your knowledge, not for you to guess.

6 A. I don't know.

7 Q. As of the date that you submitted the
8 Proof of Claim in the U.S. bankruptcy proceedings,
9 had the swaps been terminated?

10 A. I don't believe so.

11 Q. Did there come a point in time when
12 they were terminated?

13 MR. O'DONNELL: Object to form.

14 A. The estate rescinded the swap
15 contract.

16 Q. And when did the estate do that?
17 When you say "the estate," you mean the GM Nova
18 Scotia Finance bankruptcy estate?

19 A. Yes.

20 Q. Rescinded the swap contract?

21 A. Yes.

22 Q. When did it do that?

23 A. In January of 2010.

24 Q. And why did it do that?

25 A. Because the estate couldn't complete